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**EXHIBIT 5**

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12 *Attorneys for California Governor's Office of  
13 Emergency Services*

14 **UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
15 **SAN FRANCISCO DIVISION**

16 In re:  
17 PG&E CORPORATION  
18 - and -  
19 PACIFIC GAS AND ELECTRIC  
COMPANY,

20 Debtors.

- 21 ☐ Affects PG&E Corporation  
22 ☐ Affects Pacific Gas and  
Electric Company  
23 ☒ Affects both Debtors

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**CALIFORNIA GOVERNOR'S OFFICE OF  
EMERGENCY SERVICES RESPONSE TO  
OFFICIAL COMMITTEE OF TORT  
CLAIMANTS' FIRST SET OF  
INTERROGATORIES**

24  
25 The California Governor's Office of Emergency Services ("Cal OES"), for itself and no  
26 other agency, hereby responds to *Official Committee of Tort Claimants' First Set of*  
27 *Interrogatories to California Governor's Office of Emergency Services* (the "**Interrogatories**").  
28

1 **GENERAL OBJECTIONS:**

2 1. Cal OES objects to the “Instructions” in the Interrogatories as unduly burdensome  
3 and overbroad in scope to the extent they purport to require Cal OES to provide information,  
4 provide documents, or perform diligence beyond the requirements of Rule 33 of the Federal Rules  
5 of Civil Procedure. This includes, most prominently, any obligation to (i) “provide the name and  
6 address of each person known or believed to have ... knowledge [of an interrogatory]”  
7 (Instruction 5); or (ii) “[i]dentify each person who assisted or participated in preparing and/or  
8 supplying any of the information given in answer to these Interrogatories” (Instruction 6).

9 2. Cal OES objects to the Interrogatories to the extent that they seek the identification  
10 and disclosure of information protected by the attorney-client privilege, the work product  
11 doctrine, mediation privilege, the constitutional right of privacy, or any other applicable privilege,  
12 statute, law or rule. Cal OES asserts such privileges and protections to the full extent allowable.

13 3. Cal OES objects to the Interrogatories to the extent they seek “all” or “any”  
14 information as overly broad and unduly burdensome. Cal OES has made a reasonable effort to  
15 provide complete responses to the multiple interrogatories simultaneously propounded on it from  
16 multiple parties in the limited time it has been given. However, discovery is ongoing and expert  
17 discovery has not yet begun. Therefore, Cal OES reserves the right to supplement its responses to  
18 these and related interrogatories.

19 4. Cal OES does not concede that any of its responses are or will be admissible  
20 evidence in the above-captioned bankruptcy cases (or any contested matter or adversary  
21 proceeding in the bankruptcy cases).

22 5. Cal OES objects that the Interrogatories are premised on the incorrect assumption  
23 that there is a contested matter over which the Bankruptcy Court has jurisdiction. Because the  
24 *Omnibus Objection of the Official Committee of Tort Claimants (Substantive) to Claims Filed by*  
25 *California Governor’s Office of Emergency Services (Claim Nos. 87748, 87754, & 87755)* was  
26 not served as required by Rule 3007(a)(2), there is no contested matter over which the  
27 Bankruptcy Court has jurisdiction and there is no authority for any party to serve discovery on  
28 Cal OES. Cal OES provides these responses without waiving this objection.

1 **INTERROGATORY NO. 1:**

2 Identify all fire suppression services that Cal OES performed in connection with the Butte  
3 Fire.

4 RESPONSE:

5 Cal OES incorporates each of its General Objections above as if fully stated herein.

6 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
7 as follows: Cal OES did not directly perform fire suppression services in connection with the  
8 Butte Fire. Rather, Cal OES coordinated mutual aid for fire suppression with in-state and out-of-  
9 state agencies, facilitated the employment of resources for fire suppression (including several of  
10 Cal OES's fire trucks and other fire equipment), and reimbursed agencies for the costs of fire  
11 suppression services. Pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, Cal OES is  
12 producing documents showing the fire suppression service that it paid for or is obligated to pay  
13 for in connection with the Butte Fire.

14  
15 **INTERROGATORY NO. 2:**

16 Identify all rescue or emergency medical services that Cal OES provided in connection  
17 with the Butte Fire.

18 RESPONSE:

19 Cal OES incorporates each of its General Objections above as if fully stated herein.

20 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
21 as follows: Cal OES did not directly provide rescue or emergency medical services in connection  
22 with the Butte Fire. Rather, Cal OES coordinated mutual aid for rescue and emergency services  
23 with in-state and out-of-state agencies, facilitated the employment of resources for rescue or  
24 emergency medical services, and reimbursed agencies for rescue and emergency services.  
25 Pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, Cal OES is producing documents  
26 showing the rescue or emergency medical services that it paid for or is obligated to pay for in  
27 connection with the Butte Fire.

1 **INTERROGATORY NO. 3:**

2 Identify all investigations that Cal OES performed in connection with the Butte Fire.

3 RESPONSE:

4 Cal OES incorporates each of its General Objections above as if fully stated herein. Cal  
5 OES further objects to this interrogatory to the extent that it seeks the identification of  
6 information protected by the attorney-client privilege, the work product doctrine, the  
7 constitutional right of privacy, or any other applicable privilege, statute, law or rule. Cal OES  
8 asserts such privileges and protections to the full extent allowable.

9 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
10 as follows: Cal OES did not perform any investigations of the cause of the Butte Fire.

11  
12 **INTERROGATORY NO. 4:**

13 Identify all reports produced by Cal OES regarding the cause of the Butte Fire.

14 RESPONSE:

15 Cal OES incorporates each of its General Objections above as if fully stated herein.

16 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
17 as follows: Cal OES did not produce any reports regarding the cause of the Butte Fire.

18  
19 **INTERROGATORY NO. 5:**

20 Identify all emergency services provided by Cal OES to confine, prevent, or mitigate the  
21 release, escape, or burning of hazardous substances in connection with the Butte Fire.

22 RESPONSE:

23 Cal OES incorporates each of its General Objections above as if fully stated herein.

24 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
25 as follows: Cal OES personnel did not provide the physical work of emergency service to  
26 confine, prevent, or mitigate the release, escape, or burning of hazardous substances in connection  
27 with the Butte Fire. Part of Cal OES' mission is to collaborate and coordinate the California  
28 Mutual Aid System. In connection with the Butte Fire, Cal OES collaborated and coordinated

1 mutual aid, mission tasked other state departments (such as the Department of Toxic Substances  
2 Control) to confine, prevent, or mitigate the release, escape, or burning of hazardous substances,  
3 and reimbursed other agencies' costs in to confining, preventing, or mitigating the release, escape,  
4 or burning of hazardous substances.

5  
6 **INTERROGATORY NO. 6:**

7 Identify the persons employed by Cal OES who have the most knowledge regarding the  
8 factual basis for the Butte Fire Claim.

9 RESPONSE:

10 Cal OES incorporates each of its General Objections as if restated in full. Cal OES further  
11 objects that the term "most knowledgeable regarding the factual basis" of the Butte Fire Claim is  
12 vague and ambiguous. Different persons employed by Cal OES are most knowledgeable about  
13 different aspect of the Butte Fire Claim.

14 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
15 as follows: The factual basis of the Butte Fire Claim are primarily the reports and other  
16 documents showing the cause of the Butte Fire, documents showing PG&E's culpability for the  
17 Butte Fire, and the documents showing the amounts spent by other state agencies, which Cal OES  
18 was obligated or will be obligated to pay. Those reports and other documents are produced  
19 herewith. Persons employed by Cal OES who are most knowledgeable about various aspects of  
20 the Butte Fire Claim include: Tabitha Stout, Grady Joseph, Robert Larsen, John Schuessler, and  
21 Ian Bradshaw.

22  
23 **INTERROGATORY NO. 7:**

24 Identify all fire suppression services that Cal OES performed in connection with the North  
25 Bay Fires.

26 RESPONSE:

27 Cal OES incorporates each of its General Objections above as if fully stated herein.  
28

1 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
2 as follows: Cal OES did not directly perform fire suppression services in connection with the  
3 North Bay Fires. Rather, Cal OES coordinated mutual aid for fire suppression with in-state and  
4 out-of-state agencies, facilitated the employment of resources for fire suppression (including  
5 several of Cal OES's fire trucks and other fire equipment), and reimbursed agencies for the costs  
6 of fire suppression services. Pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, Cal  
7 OES is producing documents showing the fire suppression service that it paid for or is obligated  
8 to pay for in connection with the North Bay Fires.

9  
10 **INTERROGATORY NO. 8:**

11 Identify all rescue or emergency medical services that Cal OES provided in connection  
12 with the North Bay Fires.

13 RESPONSE:

14 Cal OES incorporates each of its General Objections above as if fully stated herein.

15 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
16 as follows: Cal OES did not directly provide rescue or emergency medical services in connection  
17 with the North Bay Fires. Rather, Cal OES coordinated mutual aid for rescue and emergency  
18 services with in-state and out-of-state agencies, facilitated the employment of resources for rescue  
19 or emergency medical services, and reimbursed agencies for rescue and emergency services.  
20 Pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, Cal OES is producing documents  
21 showing the rescue or emergency medical services that it paid for or is obligated to pay for in  
22 connection with the North Bay Fires.

23  
24 **INTERROGATORY NO. 9:**

25 Identify all investigations that Cal OES performed in connection with the North Bay Fires.

26 RESPONSE:

27 Cal OES incorporates each of its General Objections above as if fully stated herein. Cal  
28 OES further objects to this interrogatory to the extent that it seeks the identification of

1 information protected by the attorney-client privilege, the work product doctrine, the  
2 constitutional right of privacy, or any other applicable privilege, statute, law or rule. Cal OES  
3 asserts such privileges and protections to the full extent allowable.

4 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
5 as follows: Cal OES did not perform any investigations of the cause of the North Bay Fires.

6  
7 **INTERROGATORY NO. 10:**

8 Identify all reports produced by Cal OES regarding the cause of the North Bay Fires.

9 RESPONSE:

10 Cal OES incorporates each of its General Objections above as if fully stated herein.

11 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
12 as follows: Cal OES did not produce any reports regarding the cause of the North Bay Fires.

13  
14 **INTERROGATORY NO. 11:**

15 Identify all emergency services provided by Cal OES to confine, prevent, or mitigate the  
16 release, escape, or burning of hazardous substances in connection with the North Bay Fires.

17 RESPONSE:

18 Cal OES incorporates each of its General Objections above as if fully stated herein.

19 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
20 as follows: Cal OES personnel did not provide the physical work of emergency service to  
21 confine, prevent, or mitigate the release, escape, or burning of hazardous substances in connection  
22 with the North Bay Fires. Part of Cal OES' mission is to collaborate and coordinate the  
23 California Mutual Aid System. In connection with the North Bay Fires, Cal OES collaborated  
24 and coordinated mutual aid, mission tasked other state departments (such as the Department of  
25 Toxic Substances Control) to confine, prevent, or mitigate the release, escape, or burning of  
26 hazardous substances, and reimbursed other agencies' costs in to confining, preventing, or  
27 mitigating the release, escape, or burning of hazardous substances.



1 **INTERROGATORY NO. 12:**

2 Identify the persons employed by Cal OES who have the most knowledge regarding the  
3 factual basis for the North Bay Fires Claim.

4 RESPONSE:

5 Cal OES incorporates each of its General Objections as if restated in full. Cal OES further  
6 objects that the term “most knowledgeable regarding the factual basis” of the North Bay Fires  
7 Claim is vague and ambiguous. Different persons employed by Cal OES are most knowledgeable  
8 about different aspect of the North Bay Fires Claim.

9 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
10 as follows: The factual basis of the North Bay Fires Claim are primarily the reports and other  
11 documents showing the cause of the North Bay Fires, documents showing PG&E’s culpability for  
12 the North Bay Fires, and the documents showing the amounts spent by other state agencies, which  
13 Cal OES was obligated or will be obligated to pay. Those reports and other documents are  
14 produced herewith. Persons employed by Cal OES who are most knowledgeable about various  
15 aspects of the North Bay Fires Claim include: Tabitha Stout, Grady Joseph, Robert Larsen, John  
16 Schuessler, and Ian Bradshaw.

17  
18 **INTERROGATORY NO. 13:**

19 Identify all fire suppression services that Cal OES performed in connection with the Camp  
20 Fire.

21 RESPONSE:

22 Cal OES incorporates each of its General Objections above as if fully stated herein.  
23 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds as  
24 follows: Cal OES did not perform fire suppression services in connection with the Camp Fire.  
25 Rather, Cal OES coordinated mutual aid for fire suppression with in-state and out-of-state  
26 agencies, facilitated the employment of resources for fire suppression (including several of Cal  
27 OES’s fire trucks and other fire equipment), and reimbursed agencies for the costs of fire  
28 suppression services. Pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, Cal OES is

1 producing documents showing the fire suppression service that it paid for or is obligated to pay  
2 for in connection with the Camp Fire.

3  
4 **INTERROGATORY NO. 14:**

5 Identify all rescue or emergency medical services that Cal OES provided in connection  
6 with the Camp Fire.

7 RESPONSE:

8 Cal OES incorporates each of its General Objections above as if fully stated herein.

9 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
10 as follows: Cal OES did not directly provide rescue or emergency medical services in connection  
11 with the Butte Fire. Rather, Cal OES coordinated mutual aid for rescue and emergency services  
12 with in-state and out-of-state agencies, facilitated the employment of resources for rescue or  
13 emergency medical services, and reimbursed agencies for rescue and emergency services.  
14 Pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, Cal OES is producing documents  
15 showing the rescue or emergency medical services that it paid for or is obligated to pay for in  
16 connection with the Butte Fire.

17  
18 **INTERROGATORY NO. 15:**

19 Identify all investigations that Cal OES performed in connection with the Camp Fire.

20 RESPONSE:

21 Cal OES incorporates each of its General Objections above as if fully stated herein. Cal  
22 OES further objects to this interrogatory to the extent that it seeks the identification of  
23 information protected by the attorney-client privilege, the work product doctrine, the  
24 constitutional right of privacy, or any other applicable privilege, statute, law or rule. Cal OES  
25 asserts such privileges and protections to the full extent allowable.

26 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
27 as follows: Cal OES did not perform any investigations of the cause of the Camp Fire.

1 **INTERROGATORY NO. 16:**

2 Identify all reports produced by Cal OES regarding the cause of the Camp Fire.

3 RESPONSE:

4 Cal OES incorporates each of its General Objections above as if fully stated herein.

5 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
6 as follows: Cal OES did not produce any reports regarding the cause of the Camp Fire.

7  
8 **INTERROGATORY NO. 17:**

9 Identify all emergency services provided by Cal OES to confine, prevent, or mitigate the  
10 release, escape, or burning of hazardous substances in connection with the Camp Fire.

11 RESPONSE:

12 Cal OES incorporates each of its General Objections above as if fully stated herein.

13 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
14 as follows: Cal OES personnel did not provide the physical work of emergency service to  
15 confine, prevent, or mitigate the release, escape, or burning of hazardous substances in connection  
16 with the Camp Fires. Part of Cal OES' mission is to collaborate and coordinate the California  
17 Mutual Aid System. In connection with the Camp Fire, Cal OES collaborated and coordinated  
18 mutual aid, mission tasked other state departments (such as the Department of Toxic Substances  
19 Control) to confine, prevent, or mitigate the release, escape, or burning of hazardous substances,  
20 and reimbursed other agencies' costs in to confining, preventing, or mitigating the release, escape,  
21 or burning of hazardous substances.

22  
23 **INTERROGATORY NO. 18:**

24 Identify the persons employed by Cal OES who have the most knowledge regarding the  
25 factual basis for the Camp Fire Claim.

26 RESPONSE:

27 Cal OES incorporates each of its General Objections as if restated in full. Cal OES further  
28 objects that the term "most knowledgeable regarding the factual basis" of the Camp Fire Claim is

1 vague and ambiguous. Different persons employed by Cal OES are most knowledgeable about  
2 different aspect of the Camp Fire Claim.

3 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
4 as follows: The factual basis of the Camp Fire Claim are primarily the reports and other  
5 documents showing the cause of the Camp Fire, documents showing PG&E's culpability for the  
6 Camp Fire, and the documents showing the amounts spent by other state agencies, which Cal  
7 OES was obligated or will be obligated to pay. Those reports and other documents are produced  
8 herewith. Persons employed by Cal OES who are most knowledgeable about various aspects of  
9 the Camp Fire Claim include: Tabitha Stout, Grady Joseph, Robert Larsen, John Schuessler, and  
10 Ian Bradshaw.

11  
12 **INTERROGATORY NO. 19:**

13 Identify all amounts included in the Cal OES Claims that constitute commitments made  
14 by Cal OES to advance funds after the Filing Date.

15 RESPONSE:

16 Cal OES incorporates each of its General Objections above as if fully stated herein.

17 Subject to, as limited by and without waiving the foregoing objections, Cal OES responds  
18 as follows: Pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, Cal OES is producing  
19 documents showing the dates each of the subgrant applications (i.e. the amounts included in the  
20 Cal OES Claims) for the Butte Fire, North Bay Fires and the Camp Fire were awarded.

21  
22  
23 **INTERROGATORY NO. 20:**

24 Identify each Public Entity that Cal OES may seek to hold liable for costs incurred by Cal  
25 OES in connection with the Wildfires and the maximum amount of such liability.

26 RESPONSE:

27 Cal OES incorporates each of its General Objections above as if fully stated herein. Cal  
28 OES further objects that this interrogatory on the grounds that all the information it seeks is

1 protected by the attorney-client privilege and the attorney work product doctrine. Cal OES  
2 further objects that this interrogatory seeks information that is neither relevant nor reasonably  
3 calculated to lead to relevant information. Cal OES objects that this interrogatory is vague and  
4 ambiguous as to what is meant by “may seek to hold liable.”

5  
6 **INTERROGATORY NO. 21:**

7 Identify all sources of recovery available to Cal OES to recover costs incurred by Cal OES  
8 in connection with the Wildfires other than Cal OES’ claims against the Debtor.

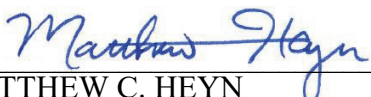
9 RESPONSE:

10 Cal OES incorporates each of its General Objections above as if fully stated herein. Cal  
11 OES further objects to this interrogatory on the grounds that all the information it seeks is  
12 protected by the attorney-client privilege and the attorney work product doctrine. Cal OES further  
13 objects that this interrogatory seeks information that is neither relevant nor reasonably calculated  
14 to lead to relevant information. Cal OES objects that this interrogatory is vague and ambiguous as  
15 to what is meant by “sources of recovery available.”

16  
17 Dated: January 20, 2020

Respectfully submitted,

18 XAVIER BECERRA  
19 Attorney General of California

20 By:   
21 MATTHEW C. HEYN  
22 Deputy Attorney General


23 FELDERSTEIN FITZGERALD  
24 WILLOUGHBY PASCUZZI & RIOS LLP

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25 *Attorneys for California Governor’s Office of*  
26 *Emergency Services*  
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I swear under penalty of perjury of the United States that the foregoing is true and correct.

  
Grady Joseph